

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

Hearing Date: April 17, 2025 at 10:00 a.m. (ET)

Objection Deadline: April 10, 2025 at 4:00 p.m. (ET)

Ref. Nos. 29729 & 29740

**CERTIFICATION OF COUNSEL REGARDING FTX RECOVERY TRUST'S  
ONE HUNDRED FIFTY-SIXTH (SUBSTANTIVE) OMNIBUS OBJECTION  
TO CERTAIN OVERSTATED AND/OR UNLIQUIDATED  
PROOFS OF CLAIM (CUSTOMER CLAIMS)**

I, Matthew R. Pierce, counsel to the FTX Recovery Trust<sup>2</sup>, hereby certify as follows to the best of my knowledge, information and belief:

1. On February 25, 2025, the FTX Recovery Trust filed the *FTX Recovery Trust's One Hundred Fifty-Sixth (Substantive) Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim (Customer Claims)* [D.I. 29729, redacted & 29740, sealed] (the "Objection").

2. Pursuant to the Notice of Objection [D.I. 29729-1 & 29740-1], any responses to the Objection were to be filed no later than April 10, 2025, at 4:00 p.m. (ET) (the "Response Deadline").

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<sup>1</sup> The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

<sup>2</sup> The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors' confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404-1].

3. The FTX Recovery Trust received an informal response to the Objection from the holder of claim number 93980 (the “Informal Response”).

4. On April 11, 2025, Chun Mo Chan (“Chan”) filed a response to the Objection [D.I. 30115] (the “Chan Response”).

5. As of the Date hereof, no other responses to the Objection have been filed or served on the FTX Recovery Trust.

6. The FTX Recovery Trust resolved the Informal Response without the need for revisions to the proposed form of order.

7. The FTX Recovery Trust has revised the proposed form of order (“Revised Order”), a copy of which is attached hereto as **Exhibit A**, to reflect the adjournment of the Objection solely with respect to Chan’s claim. A copy of the Revised Order compared against the proposed form of order attached to the Objection is attached hereto as **Exhibit B**. In accordance with the Court’s electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

8. Accordingly, the FTX Recovery Trust respectfully requests that the Court enter the Revised Order at its earliest convenience.

Dated: May 7, 2025  
Wilmington, Delaware

**LANDIS RATH & COBB LLP**

/s/ Matthew R. Pierce

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